

HONORABLE DAVID G. ESTUDILLO

UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF WASHINGTON  
AT TACOMA

JANICE HENNESSEY,

Plaintiff,

v.

AMERICREDIT FINANCIAL SERVICES, INC.  
DBA GM FINANCIAL, HOBLIT AUTOMOTIVE,  
INC. DBA HOBLIT CHEVROLET GMC AND  
HOBLIT BUICK GMC,

Defendants.

NO. 3:24-CV-05145-DGE

**STIPULATED MOTION AND  
PROPOSED ORDER TO  
EXTEND TIME TO RESPOND  
TO MOTION FOR RELIEF**

**Noted for: September 26, 2024**

**STIPULATED MOTION**

COME NOW, the parties, by and through their counsel of record, and submit the following stipulated motion and proposed order to extend the time for defendants to file a Response to Plaintiff's Motion for Relief from Order and Judgment & Request for Indicative Ruling Under Rule 62.1(A) (Dkt. #54). The Motion is noted for October 4, 2024, making the current deadline for defendants to file a Response September 30, 2024. The parties stipulate and request the deadline be extended 14 days to October 15, 2024 (due to the Federal Court holiday on October 14, 2024). The grounds for this motion are as follows:

1           1.     Plaintiff's Motion for Relief from Order and Judgment & Request for Indicative  
2 Ruling Under Rule 62.1(A) (Dkt. #54) consists of 30 pages and is supported by 23 exhibits.

3           2.     Plaintiff's motion contains new legal allegations based on allegedly newly-found  
4 evidence. Investigation of these new claims will require additional time and resources.

5           3.     Additional time to respond to plaintiff's Motion would be beneficial to defendants  
6 and the Court, as it will allow defendants to fully investigate the claims and prepare a full and  
7 complete response to this new information and new claims.  
8

9           For the reasons set forth above, defendants respectfully request that they be granted an  
10 extension until and including October 15, 2024 to file a Response to Plaintiff's Motion for Relief  
11 from Order and Judgment & Request for Indicative Ruling Under Rule 62.1(A). Plaintiff agrees  
12 to this request and courteously joined in this motion.  
13

14           IT IS SO STIPULATED this 26th day of September, 2024.

15           BAKER STERCHI COWDEN & RICE,  
16 LLC

CAIRNCROSS & HEMPELMANN

17 By: s/ Robert L. Christie  
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23 I certify that this memorandum contains 248  
24 words, in compliance with the Local Civil  
Rules.

25 *[Signatures continued on following page]*  
26

1  
2  
3 By \_\_\_\_\_  
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10  
11

12 **ORDER**

13 Based upon the foregoing Stipulation,

14 IT IS HEREBY ORDERED, ADJUDGED AND DECREED that the deadline for  
15 defendants to file a Response to Plaintiff's Motion for Relief from Order and Judgment &  
16 Request for Indicative Ruling Under Rule 62.1(A) is extended until and including October 15,  
17 2024.

18 DATED this 26th Day of September 2024.

19  
20  
21 

22 David G. Estudillo  
23 United States District Judge  
24

25 Presented By:

26 BAKER STERCHI COWDEN & RICE, LLC

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STIPULATED MOTION AND PROPOSED  
ORDER TO EXTEND TIME TO RESPOND  
TO MOTION FOR RELIEF (3:24-CV-05145-DGE) - 3

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